INITIAL REVIEW OF NOTICE OF INTENTION TO COMMENCE LARGE MINING OPERATIONS

Robert Steele Hi Cal #1 Mine

M/023/071 July 18, 2003

R647-4-105 - Maps, Drawings & Photographs

105.3 Drawings or Cross Sections (slopes, roads, pads, etc.)

Please furnish a minimum of one north-south and one east-west cross-section of the mine area. These sections should show the surface, before mining, after mining and after reclamation. (DJ)

The maps furnished with the review reply were plat maps showing the features of the mine, no cross-sections were furnished. (DJ)

R647-4-106 - Operation Plan

106.3 Estimated acreages disturbed, reclaimed, annually.

Acreage to be disturbed during the life of this operation indicates .5 acres of access/haulroad and .5 acres of overburden/waste dumps. Please indicate on the site map the locations of these features. (DJ)

It was unclear whether the overburden/waste dumps and access/haulroads shown on the plat maps was the areas referred to in this statement. (DJ)

Attachment #4 map should be modified to indicate the areas to be disturbed (mined) annually for the life of this permit. (DJ)

The areas of future expansion not shown on plat maps furnished with the reply. (DJ)

106.4 Nature of materials mined, waste and estimated tonnages

The plan shows that the overburden depth of 2 feet, but the estimated waste produced during mining is stated as "none". Please review this statement and correct the plan accordingly. (DJ)

The reply furnished is sufficient. (DJ)

106.9 Location & size of ore, waste, tailings, ponds

Please show the size and location of waste piles to be constructed at the site. (DJ) Overburden pile shown on plat map. Reply is sufficient. (DJ)

R647-4-107 - Operation Practices

107.1 Public safety & welfare

107.1.15 Constructing berms, fences, etc. above highwalls

Berms or fences should be constructed above any highwalls that may exist at the site. Signs warning the public of the hazards posed by these features should be placed on the berms or fences. (DJ)

Reply states berms have been constructed, signs will be placed. (DJ)

107.6 Concurrent reclamation

In this section, the application refers to Attachment 4 which is a map showing a small reclaimed area on the northeast side of the disturbance. The application needs to discuss whether concurrent reclamation is feasible and how and where it will be done. (PBB)

R647-4-109 - Impact Assessment

109.4 Slope stability, erosion control, air quality, safety

A crusher is being used onsite to prepare the material for removal. Has an air quality permit been applied for from the Utah Air Quality Division? Please include a copy of the application with your response to this review. (DJ)

Air quality permit number furnished. (DJ)

R647-4-110 - Reclamation Plan

110.2 Roads, highwalls, slopes, drainages, pits, etc., reclaimed

The plan does not indicate whether any highwalls will exist during and after mining. Please show the size and location of any highwalls that may result from your mining activities. If highwalls do occur at the site, please indicate the reclamation treatments that will be applied in these areas. (DJ)

Reply states that highwalls will be covered with waste clay (overburden) and topsoil and reseeded. Please state final slope angle of these features. (DJ)

R647-4-111 - Reclamation Practices

The plan states "At the completion of mining Rule R647-3-107, 108, & 109 will comply with this mining operation." This statement is confusing because Rule R647-3- are rules to be applied to small mines, Rule R647-4 are rules that apply to a large mine application. The plan should provide a description of which portions of these rules would apply to this operation and the planned actions to address these impacts. (DJ)

All large mine rules will apply to the operation of this permit. (sufficient) (DJ)

111.1 Public safety & welfare

1.15 Constructing berms/fences above highwalls

If highwalls result from mining activities, berms or fencing need to be constructed above these areas. (DJ)

See R647-4-107.1 reply. (DJ)

111.7 Highwalls stabilized at 45 degrees or less

Page 3 Initial Review M/023/071 July 18, 2003

If highwalls occur on the site, the plan should indicate what method would be used to stabilize these areas. (DJ)

See R647-4-110.2

R647-4-113 - Surety

A blank reclamation surety form is included with this review for your use. (DJ) A copy of a blank surety form is attached. (DJ)

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RECLAMATION SURETY ESTIMATE

mine operator

mine name

last revision filename M000-000.WB2

County

10/07/02 page "estimate D8"

DOGM file Number

Prepared by Utah State Division of Oil, Gas & Mining

Note: actual unit costs may vary according to site conditions last unit cost update 10/07/02 -Amount of disturbed area which will receive reclamation treatments = acres -Estimated total disturbed area for this mine = acres <u>Activity</u> Note Quantity <u>Units</u> \$/unit \$ Safety gates, signs, etc. (mtls & installation) 0 sum 200 0(1) Demolitions of buildings and facilities 0 cf 0.26 0 (2) Debris & equipment removal - trucking 0 trips 55 0 (3) Debris & equipment removal - dump fees 0 ton 60 0 (4) Debris & equipment removal - loading trucks w/FE loader 0 hours 180 0 (5) Demolition & debris removal - general labor 0 hours 15 0 (6) Regrading facilities areas (2 ft depth) 0 acre 613 0 (7) Regrading waste dump slopes 0 CY 0 (8) 0.6 Ripping waste dump tops 0 acre 246 0 (9) Ripping stockpile & compacted areas 0 acre 246 0 (9) Ripping pit floors 0 (9) 0 acre 246 Ripping pit access roads (2 ft depth) 0 (9) 0 acre 613 Creating safety berms or barriers around highwalls 0 LF 0.2 0 (10) Ripping access roads - dozer 0 acre 0 (9) 246 Regrading access roads - dozer 0 acre 246 0 (9) Sidecast mtl replacement on steep roads - trackhoe 0 LF 1.25 0 (11) Surface drainage restoration or construction 0 LF 0.2 0 (10) Topsoil replacement - dozer 0 CY 0.58 0 (12) Topsoil replacement - scraper 0 CY 1.19 0 (13) Topsoil replacement - truck & FE loader 0 CY 2.65 0 (14) Mulching (2 ton/acre alfalfa/straw) 0 acre 350 0 (00) Fertilizing (100 lb/acre diammonium phosphate) 0 (00) 0 acre 90 Composted manure (10 ton/acre) 0 acre 300 0 (00) Broadcast seeding 0 (00) 0 acre 240 Drill seeding 0 acre 240 0 (00) Hydroseeding 0 acre 800 0 (00) General site cleanup & trash removal 0 acre 50 0 (00) 0 (00) Equipment mobilization 0 equip 2000 400 Reclamation supervision 0 (15) 0 days Subtotal 0 10% Contingency 0 Subtotal 0 Escalate for 5 years at 2.89% per year 0 Total 0 Rounded surety amount in year 2008 \$ Average cost per disturber acre = #DIV/0!